IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.

PROMESA Title III

No. 17 BK 3283-LTS (Jointly Administered)

INFORMATIVE MOTION OF FINANCIAL GUARANTY INSURANCE COMPANY FOR APPEARANCE AT AUGUST 15, 2019 HEARING

To the Honorable United States District Judge Judith Gail Dein:

Financial Guaranty Insurance Company ("FGIC"), by and through its attorneys, Rexach & Picó, CSP and Butler Snow LLP, files this *Informative Motion of Financial Guaranty Insurance Company for Appearance at August 15, 2019 Hearing*. In support of the Motion, FGIC respectfully states as follows:

- 1. Martin A. Sosland intends to appear on behalf of FGIC at the Hearing ¹ in Courtroom 8 of the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts 02210 on the following items:
 - a. Ambac Assurance Corporation's Motion to Compel Compliance with the Court's December 15, 2017 and February 26, 2018 Orders Regarding the Urgent Renewed Joint Motion of the Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., the Mutual Fund Group, and National

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms as in that certain *Hearing Procedures Order* [Case No. 17-3283, Dkt. # 8387] (the "*Order*").

Public Finance Guarantee Corporation for Order and National Public Finance Guarantee Corporation for Order Authorizing Rule 2004 Examination [Dkt. #7505].

- i. Joinder of Financial Guaranty Insurance Company to Ambac Assurance Corporation's Motion to Compel Compliance with the Court's December 15, 2017 and February 26, 2018 Orders Regarding the Urgent Renewed Joint Motion of the Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., the Mutual Fund Group, and National Public Finance Guarantee Corporation for Order and National Public Finance Guarantee Corporation for Order Authorizing Rule 2004 Examination [Dkt. #7674].
- b. Ambac Assurance Corporation's Motion for Entry of Order Authorizing

 Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities

 [Dkt. #7507].
 - i. Joinder of Financial Guaranty Insurance Company to Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities [Dkt. #7675].
- c. Any objections, responses, statements, joinders, or replies to any of the foregoing pleading.

2. Further, Martin A. Sosland also reserves the right to present argument or respond to any agenda item, matters raised by the Court or to any statements made by any party in connection with the above-captioned Title III proceedings or any adversary proceedings currently pending in the above-captioned Title III proceedings.

Dated: August 12, 2019.

Respectfully submitted,

REXACH & PICÓ, CSP

By: /s/ María E. Picó

María E. Picó USDC-PR 123214

802 Ave. Fernández Juncos San Juan PR 00907-4315 Telephone: (787) 723-8520 Facsimile: (787) 724-7844

E-mail: mpico@rexachpico.com

BUTLER SNOW LLP

By: /s/ Martin A. Sosland

Martin A. Sosland (*pro hac vice*) 5430 LBJ Freeway, Suite 1200 Dallas, TX 75240

Telephone: (469) 680-5502 Facsimile: (469) 680-5501

E-mail: martin.sosland@butlersnow.com

Jason W. Callen (*pro hac vice*) 150 3rd Avenue, South, Suite 1600 Nashville, TN 37201

Telephone: (615) 651-6774 Facsimile: (615) 651-6701

E-mail: jason.callen@butlersnow.com

Attorneys for Financial Guaranty Insurance Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will notify case participants.

Dated: August 12, 2019. Respectfully submitted,

By: <u>/s/ Martin A. Sosland</u> Martin A. Sosland

Attorney for Financial Guaranty Insurance Company